

Approved:   
SCOTT HARTMAN  
Assistant United States Attorney

Before: HONORABLE PAUL E. DAVISON  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA

:  
**SEALED COMPLAINT**

-v.-

:  
Violations of 18 U.S.C.  
§§ 1951, 1513(b)(2),  
2113(a) and 2

ISAIAH WASHINGTON, a/k/a "Ah-ah,"  
DIONDRE CARLISLE, a/k/a "Slim Gz,"  
RAKEEM FLOWERS, a/k/a "Ra Ra,"  
TYRONE SMITH, a/k/a "Gudda," and  
JUSTIN EDWARDS, a/k/a "Suckafree,"

:  
COUNTY OF OFFENSE:  
WESTCHESTER

Defendants.

**14 MAG 2516**

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SOUTHERN DISTRICT OF NEW YORK, ss.:

JOHN SULLIVAN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

*ISAIAH WASHINGTON* COUNT ONE  
(Hobbs Act Robbery Conspiracy)

1. In or about Fall of 2014, in the Southern District of New York, a/k/a "Ah-ah," and DIONDRE CARLISLE, a/k/a "Slim Gz," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WASHINGTON and CARLISLE, and others known and unknown, agreed to rob banks in Yonkers, New York, that transacted in interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT TWO  
(Bank Robbery)

2. On or about October 27, 2014, in the Southern District of New York, ISAIAH WASHINGTON, a/k/a "Ah-ah," and DIONDRE CARLISLE, a/k/a "Slim Gz," the defendants, by force and violence, and by intimidation, did knowingly take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management and possession of, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and did aid and abet the same, to wit, WASHINGTON, aided and abetted by CARLISLE, robbed a branch of Citibank branch located at 86 Main Street in Yonkers, New York.

(Title 18, United States Code, Section 2113(a) and 2.)

COUNT THREE  
(Attempted Bank Robbery)

3. On or about November 3, 2014, in the Southern District of New York, DIONDRE CARLISLE, a/k/a "Slim Gz," the defendant, by force and violence, and by intimidation, did knowingly take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management and possession of, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and did aid and abet the same, to wit, CARLISLE planned the robbery of a Chase Bank branch at 47 South Broadway in Yonkers, New York, and took substantial steps towards carrying that robbery out.

(Title 18, United States Code, Section 2113(a) and 2.)

COUNT FOUR  
(Witness Tampering)

4. On or about November 4, 2014, in the Southern District of New York, RAKEEM FLOWERS, a/k/a "Ra Ra," TYRONE SMITH, a/k/a "Gudda," and JUSTIN EDWARDS, a/k/a "Suckafree, the defendants, did knowingly attempt to engage in conduct, which would cause bodily injury to a person, and did threaten to do so, with the intent to retaliate against that individual for information given by that individual to a law enforcement officer relating to the commission of a Federal offense, and did aid and abet the same.

(Title 18, United States Code, Section 1513(b)(2) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I have been involved in the investigation of this matter, and I base this affidavit on that experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### THE CITIBANK ROBBERY

6. From reviewing a report prepared by a police officer at the City of Yonkers Police Department ("CYPD"), I have learned that on or about October 27, 2014, at approximately 12:20 p.m., CYPD personnel from the responded to a report of a robbery (the "Citibank Robbery") at a branch of Citibank located at 86 Main Street in Yonkers, New York (the "Citibank Branch").

7. Upon arriving at the Citibank Branch, a CYPD detective interviewed a bank teller ("Teller-1"), who provided the following information, in substance and in part:

a. Earlier that day, slightly after 12:00 p.m., a young black male came into the bank wearing a grey hooded sweatshirt, a blue jean jacket, a ski mask that covered his forehead and his lower face, and a latex glove on his right hand ("Suspect-1").

b. Suspect-1 approached Teller-1's window and slid a note under the protective partition. The note was written on lined notebook paper using what appeared to be a black marker. It said, in substance, "No dye pack. \$50's and \$100's. Don't be a hero. You have 20 seconds."

c. Teller-1 gave Suspect-1 all of the \$50 bills that were in his cash drawer along with some of the \$100 bills. Teller-1 also gave Suspect-1 back his note. As Teller-1 handed off the cash, he also pressed the panic button located near his teller window.

d. Suspect-1 left the bank and made a right turn as he exited the front door.

e. After Suspect-1 left the bank, Teller-1 notified

his colleagues of what had happened. A fellow teller locked the front door to the bank and the bank ceased to do business until the police arrived.

8. I have reviewed video surveillance footage depicting the Citibank Robbery. The footage is consistent with Teller-1's account of the robbery. According to the clock on the screen, the robbery took place at approximately 12:18 p.m. Notably, in the video, the jacket that Suspect-1 is wearing appears to have a large logo on the back of it. Several still shots from the video are attached hereto as Exhibit A.

9. I have reviewed video footage captured on October 27, 2014 by surveillance cameras inside of an apartment building located at 47 Riverdale Avenue in Yonkers ("47 Riverdale"), from which I have learned the following, in substance and in part:

f. At approximately 12:06 p.m., a camera stationed at the door to 47 Riverdale (the "47 Door Camera") captured an individual who appears to be dressed identically to Suspect-1 entering the building. Still images excerpted from the video are attached hereto as Exhibit B. Notably, the individual who appears to be dressed like Suspect-1 is wearing a light colored jean jacket with a Native American headdress and the word "Tough" imprinted on the back (the "Tough Jacket").

g. At approximately 12:08 p.m., the 47 Door Camera captured 7 young black males exiting 47 Riverdale. Still images excerpted from the video are attached hereto as Exhibit C. One of the individuals exiting the building appears to be the person wearing the Tough Jacket who entered the building at 12:06 p.m. Another member of the group was wearing a black cowl over his head, a light grey hooded sweatshirt and black pants ("Suspect-2"). A third member of the group was wearing a sweatshirt with a large New York Yankees logo on the front ("Suspect-3").

h. At approximately 12:20 p.m. the 47 Door Camera, and a camera directly inside of the door to 47 Riverdale captured an individual who appeared to be wearing pants similar to Suspect-1 and carrying an item that appeared to be the Tough Jacket entering the building.

10. Based upon my review of previous booking photographs, I believe that the individual wearing the Tough Jacket, who was captured by the 47 Door Camera at or about 12:08 p.m. on October 27, 2014, is ISAIAH WASHINGTON, a/k/a "Ah-ah," the defendant. I further believe that the individual identified as Suspect-2 above is DIONDRE

CARLISLE, a/k/a "Slim Gz," the defendant.

11. I have also reviewed video footage from a surveillance camera stationed inside of a parking garage located directly behind the Citibank Branch. At approximately 12:14 p.m. on October 27, 2014, that camera captured 4 males meeting together inside the garage. Still images excerpted from the video are attached hereto as Exhibit D. Three of the group's members appear to be dressed identically to Suspect-1, Suspect-2, and Suspect-3, respectively. On the video, the man dressed like Suspect-2 appears to hand something to the man dressed like Suspect-1.

12. Additionally, I have reviewed video footage from a surveillance camera stationed inside the lobby of 50 Hawthorne Street, which occupies the western portion of the block where 47 Riverdale is located (the "50 Hawthorne Video"). At approximately 12:19 p.m. on October 27, 2014, that camera captured four males in the lobby of that building. The four males appear to be dressed identically to 4 of the men who came out of 47 Riverdale with Suspect-1 at 12:08 p.m.. One of them appears to be Suspect-2. In the footage, still images from which are attached hereto as Exhibit E, the man dressed like Suspect-2 removed what appeared to be cash from his sock and distributed it to the other three men.

13. I have reviewed images posted to an Instagram account titled "Zaya\_69." The owner of the Instagram account identifies himself as "isaiah washington" and the account includes multiple photographs of an individual who I believe, based upon my review of prior booking photographs, to be ISAIAH WASHINGTON, a/k/a "Ah-ah," the defendant. Among the photos that appear on the account is a photo of an individual who appears to be WASHINGTON wearing what appear to be the same jacket and hooded sweatshirt worn by Suspect-1 during the Citibank Robbery (the "Instagram Photo"). A copy of the Instagram Photo is attached hereto as Exhibit F.

14. I have spoken with a CYPD investigator, who has informed me that the Instagram Photo was posted on the day of the Citibank Robbery.

15. From speaking with a YPD detective, I know that on or about October 31, 2014, YPD detectives conducting surveillance observed ISAIAH WASHINGTON, a/k/a "Ah-ah," the defendant, walking down the sidewalk in Yonkers. WASHINGTON was wearing a jacket that appeared to be identical to the Tough Jacket. When the detectives attempted to stop WASHINGTON, he fled. WASHINGTON was ultimately detained and placed under arrest in connection with the Citibank Robbery.

16. Subsequent to his arrest, ISAIAH WASHINGTON, a/k/a "Ah-ah," the defendant, was informed of his Miranda rights. WASHINGTON waived those rights, and stated, among other things, that he was the person depicted in the Instagram Photo.

17. I have confirmed that the deposits of the Citibank Branch are insured by the Federal Deposit Insurance Corporation and that Citibank is a nationwide bank that conducts business in interstate commerce.

#### THE NOVEMBER 3 BANK ROBBERY ATTEMPT

18. I have spoken with a cooperating witness (the "CI"), who has provided information regarding the planned robbery of a bank in Getty Square in Yonkers on or about November 3, 2014 (the "November 3 Bank Robbery Attempt").<sup>1</sup> Specifically, the CI has provided the following information, in substance and in part:

i. On or about November 3, 2014, the CI was hanging out with a female friend ("CC-1") when CC-1 was contacted by an individual whom the CI knows as "Slim GZ." CC-1 told the CI that Slim Gz had contacted her to enlist her help in committing the robbery of a bank in the Bronx, New York.<sup>2</sup> CC-1 told the CI that Slim Gz planned for the robbery to be committed using a handgun and that two cars would meet Slim Gz, CC-1, and the CI in front of 85 Riverdale in Yonkers to take them to the location in the Bronx where the robbery would occur.

j. The CI and CC-1 traveled to 85 Riverdale Avenue, where they met with Slim Gz. CI and CC-1 spoke with Slim Gz, and Slim Gz spoke with other individuals. At a certain point, Slim Gz

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<sup>1</sup> The CI has provided information not only about the November 3 Bank Robbery Attempt, but also about a broader robbery conspiracy involving ISAIAH WASHINGTON, a/k/a "Ah-ah," and DIONDRE CARLISLE, a/k/a "Slim Gz," the defendants, as well as other individuals, some of whom have been arrested, others of whom have not been. Information provided by the CI has been corroborated by, among other things, post-arrest statements of certain arrested defendants, video surveillance and, as discussed below, the seizure of evidence following arrests undertaken, in part, on the basis of information provided by the CI.

<sup>2</sup> CC-1, Slim Gz, and the CI had previously discussed robbing a bank in Hastings, New York. That robbery did not ultimately occur, in part because the CI refused to participate in it. Subsequently, and prior to the November 3 Bank Robbery Attempt, the CI began cooperating with the Government.

informed the CI and CC-1 that the plan had changed, that they would be robbing a Chase Bank in Getty Square in Yonkers, and that no gun would be used.

k. Shortly thereafter, the CI and CC-1 accompanied Slim Gz to a nearby convenience store. Slim Gz went into the store and came back several minutes later with two pieces of paper.

l. The CI then accompanied CC-1 and Slim Gz to the vestibule of 47 Riverdale Avenue. In the vestibule, Slim Gz took out a piece of paper and wrote a note that would be used in the robbery. CC-1 began preparing for the robbery by putting on a hooded sweatshirt, putting a cowl over her head, and raising the hood of her sweatshirt.

m. The CI, CC-1 and Slim Gz then exited the lobby of 47 Riverdale and began walking toward Getty Square. They entered a parking garage, where they were all three stopped by CYPD officers. CC-1 and Slim Gz were placed under arrest. The CI, who had been providing status updates to the CYPD throughout the day regarding the planned robberies, was not arrested, but he was detained a YPD headquarter for a time, so that CC-1 and Slim Gz would believe that he had been arrested and released on bail.

19. From speaking with a CYPD detective who was present for the arrests of CC-1 and Slim Gz, I know that, subsequent to his arrest, Slim Gz identified himself to law enforcement as DIONDRE CARLISLE, a/k/a "Slim Gz," the defendant. I also know that, when she was arrested, CC-1 was carrying a brown paper bag. Inside of the bag were an empty ladies handbag and a note that read, "You have 20 second to fill this bag with 100s & 50s. No dye pack. Make any funny movement you will die!!!" (the "November 3 Robbery Note")

20. I have reviewed video surveillance footage captured in the vestibule of 47 Riverdale shortly before the arrests of CC-1 and DIONDRE CARLISLE, a/k/a "Slim Gz," the defendant. The video footage is consistent with the CI's account and shows, among other things, an individual who appears to be CC-1 dressing for the robbery and an individual who appears to be CARLISLE writing out something on a sheet of paper.

21. I have reviewed video footage of a statement made by DIONDRE CARLISLE, the defendant, following his arrest. Prior to the interview, CARLISLE was informed of his Miranda. CARLISLE waived those rights and stated, among other things, that he personally wrote the November 3 Robbery Note. During the interview, CARLISLE was also shown still images from the 50 Hawthorne Video, captured in connection with the Citibank Robbery. In these photographs, CARLISLE

identified himself as the person described as Suspect-2 above.

22. I have confirmed that the Chase Bank in Getty Square is located at 47 South Broadway in Yonkers, New York and that its deposits are insured by the Federal Deposit Insurance Corporation.

**THE NOVEMBER 4 WITNESS INTIMIDATION**

23. From speaking with the CI and reviewing a written statement that he gave to the CYPD, I have learned the following, in substance and in part:

a. On or about the evening November 4, 2014, the CI went to an apartment located inside of 80 Riverdale Avenue in Yonkers ("80 Riverdale Apartment"). The CI went to the 80 Riverdale Apartment because he was having a dispute with his parents and needed a place to spend the night. When the CI got to the apartment, an individual, who later identified himself as "Suckafree" opened the door. The CI asked to see "Gudda," a person that the CI knew from the neighborhood who sometimes stayed at the 80 Riverdale Apartment.

b. The CI met Gudda in a bedroom of the 80 Riverdale Apartment. Suckafree came into the bedroom as well and introduced himself." A third male ("Suspect-3") also came into the bedroom but did not identify himself. Gudda asked the CI what he had told the police after the foiled bank robbery on November 3 and whether he had said anything to implicate Gudda. Suckafree told the CI that he did not care if the CI had "ratted out" Slim Gz, but he just wanted to know what the CI had told the police. The CI denied that he had given the police any information. Suspect-3 said, in substance, "Yo, just smoke him. Just smoke him. He lying. He ratted out Slim Gz."

c. After the CI again denied that he had provided information to the police, Gudda, Suckafree, Suspect-3 appeared to let the issue drop. Gudda went to take a shower, and the CI went with Suckafree and Suspect-3 to get a bottle of liquor.

d. When the CI, Suckafree, and Supsect-3 returned to the 80 Riverdale Apartment, however, Gudda again confronted the CI in the back bedroom. Gudda told the CI that he believed the CI had provided information to the police and that the CI should confess to having done so. The CI again denied that he had spoken to the police. Suckafree then produced a black gravity knife, opened the blade and held it to the CI's neck. Gudda then said to the CI, in substance, "You have one more chance . . . Tell us the truth and I give you my word that he ain't gonna hurt you." Suspect-3 said repeatedly, "Do it. Smoke him."

e. Afraid for his safety, the CI confessed to providing information to the police after they foiled the November 3 Bank Robbery Attempt, though not before. Suckafree then said, "You know I'm gonna kill you, right?" Suckafree then turned to Gudda and said, "Gudda, let me kill him."

f. In an effort to get out of the 80 Riverdale Apartment, the CI told Suspect-3, Suckafree, and Gudda that he had \$500 at a friend's apartment on Purser Place and that, if they would come with him, he would give them the money. The men agreed. Before they left the apartment, however, Suckafree said, "Run his pockets." Gudda then reached into the CI's pockets and removed \$65 and a white cellphone with a grey case (the "CI Cellphone").

g. Suspect-3, Suckafree, and Gudda then led the CI out of the apartment and to a cab. They traveled to an address on Purser Place that was, in fact the residence of the CI's parents. When they got to the building, the CI led Suspect-3 and Suckafree into the building and to his parents' apartment, while Gudda waited in the cab. The CI knocked on the door to his parents' apartment. When his father opened the door, the CI slid inside and his father closed the door. As the CI told his family what had happened, he heard what he believes was the sound of Suspect-3 and Suckafree running away.

24. The CI notified the CYPD of the threat on his life and met with CYPD investigators late on November 4, 2014. At that time, the CI was shown two photo arrays, from which he identified TYRONE SMITH, a/k/a "Suckafree," and RAKEEM FLOWERS, a/k/a "Ra Ra," the defendants, as Suckafree and Suspect-3, respectively.

25. The CI also showed investigators photographs of "Gudda" on his personal Facebook page. Based upon prior booking photos, "Gudda" has been identified as TYRONE SMITH, a/k/a "Gudda," the defendant.

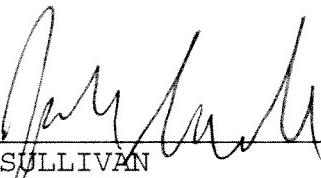
26. After the CI reported the threat, members of the CYPD went to the 80 Riverdale Apartment and obtained consent from an occupant to enter and search it. Inside they found the CI Cellphone.

27. I have reviewed a statement provided by a taxi driver who worked in Yonkers on November 4, 2014, from which I have learned the following information, in substance and in part:

a. On November 4, 2014, at approximately 8:55 p.m., the Taxi Driver was dispatched to 80 Riverdale Avenue to pick up a fare in route to Purser Place and returning to 80 Riverdale Avenue. When he arrived, four males got in his car. When they arrived on

Purser Place, three males got out of the car, while one remained in the back seat. Within a few minutes, two males came running from the building back to the car and got inside. The driver asked if the fourth male was coming back. He was told that the fourth male was not coming back and that he should return to 80 Riverdale Avenue.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of ISAIAH WASHINGTON, a/k/a "Ah-ah," DIONDRE CARLISLE, a/k/a "Slim Gz," RAKEEM FLOWERS, a/k/a "Ra Ra," TYRONE SMITH, a/k/a "Gudda," JUSTIN EDWARDS, a/k/a "Suckafree, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.



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JOHN SULLIVAN  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
7<sup>th</sup> day of November, 2014



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HONORABLE PAUL E. DAVISON  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

**EXHIBIT A**



10/27/2014 12:17:47.39  
Surveillance  
NY340VR1

10/27/2014 12:17:58.68  
Surveillance  
NY340VR1



10/27/2014 12:18:35.21  
Surveillance  
NY340VR1

EXHIBIT B



**EXHIBIT C**



**EXHIBIT D**



**EXHIBIT E**



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